

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Calloway Iv, Jesse, Administrator
for Calloway Estate Trust
Plaintiff

v.

Philadelphia Parking Authority,
Philadelphia Police Department,
and John Does 1-5 (as yet unidentified officers)
Defendants

Civil Action No: _____

Verified Complaint for Injunctive Relief, Damages, and Declaratory Judgment

INTRODUCTION

This is an action brought by the Administrator of a private trust estate seeking immediate relief against the unlawful conversion, impoundment, and scheduled auction of private trust property—a 2003 Chevrolet Tahoe, VIN: 1GNEK13Z73J107679—by the Philadelphia Parking Authority and the Philadelphia Police Department. The Plaintiff also seeks declaratory judgment, compensatory damages, punitive damages, and emergency injunctive relief due to civil rights violations, administrative obstruction, and denial of due process under color of law.

JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1331 and § 1343 as this action arises under the Constitution and laws of the United States.
2. Venue is proper in this Court under 28 U.S.C. § 1391 as all events occurred within the Eastern District of Pennsylvania.

PARTIES

3. Plaintiff, Calloway Iv, Jesse, is the living Administrator for Calloway Estate Trust, a private, irrevocable trust domiciled in Pennsylvania.
4. Defendant, Philadelphia Parking Authority (PPA), is a municipal corporation responsible for parking enforcement within Philadelphia.
5. Defendant, Philadelphia Police Department (PPD), is a law enforcement agency

operating within Philadelphia.

6. Defendants John Does 1-5 are unknown officers who participated in the unlawful seizure on June 27, 2025.

FACTUAL BACKGROUND

7. On or about June 27, 2025, Defendants unlawfully seized a 2003 Chevrolet Tahoe, VIN: 1GNEK13Z73J107679, property of the Calloway Estate Trust.

8. Plaintiff provided administrative notices, affidavits, and claims of ownership, which were received but not acknowledged by PPA.

9. On July 9, 2025, Plaintiff spoke with Ms. Barnes at 913 Filbert Street who refused to issue documentation related to the seizure.

10. On the same day, Plaintiff also spoke with Gianna in the legal department of PPA who accepted paperwork but refused to issue a date/time-stamped receipt.

11. Plaintiff possesses video evidence of the seizure and is in the process of identifying the officers involved.

12. PPA has scheduled the Tahoe for public auction on July 24, 2025 without the 30-day notice required by law.

13. State courts have refused to hear the matter absent a commercial appeal form, despite Plaintiff operating as a private trust outside statutory jurisdiction.

CLAIMS FOR RELIEF

Count I – Violation of Civil Rights (42 U.S.C. § 1983)

Count II – Conspiracy to Violate Rights (42 U.S.C. § 1985)

Count III – Unlawful Seizure and Conversion of Trust Property

Count IV – Obstruction of Administrative Remedy

Count V – Fraud by Omission and Color of Law Abuse

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court:

A. Issue a Temporary Restraining Order and Preliminary Injunction halting the July 24, 2025 auction;

B. Declare that the subject vehicle is private trust property unlawfully held;

C. Award compensatory damages in the amount of \$51,900;

D. Award punitive damages in the amount of \$250,000;

E. Award reasonable costs and fees;

F. Grant such other and further relief as this Court deems just and proper.

VERIFICATION

I, Calloway Iv, Jesse, hereby verify that the foregoing is true and correct to the best of my knowledge and belief, under penalty of perjury under the laws of the United States.

Executed on this 10th day of July 2025.

By:


Calloway Iv, Jesse

Administrator for Calloway Estate Trust

All Rights Reserved - UCC 1-308- Without recourse



JS 44 (Rev. 10/20)

REC'D JUL 11 2025

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS:

Calloway Iv, Jesse — Attorney-in-Fact, Administrator of the Calloway Estate Trust

(b) County of Residence of First Listed Plaintiff: Philadelphia

(c) Attorneys (Firm Name, Address, and Telephone Number):
Private Capacity – Administrator in Propria Persona

II. BASIS OF JURISDICTION:

☒ 3 Federal Question (U.S. Government Not a Party)

III. CITIZENSHIP OF PRINCIPAL PARTIES:

☒ N/A – Plaintiff is acting as Administrator of a private trust and is not asserting U.S. citizen or state resident status. Private, non-domestic, trust-based claimant under law of equity and contract.

IV. DEFENDANTS:

Philadelphia Parking Authority
Philadelphia Police Department
John Does 1–5

V. ORIGIN:

☒ Original Proceeding

VI. NATURE OF SUIT:

☒ 440 Other Civil Rights
☒ 210 Land/Real Property Seizure
☒ 890 Other Statutory Actions

VII. CAUSE OF ACTION:

42 U.S.C. § 1983, § 1985; Unlawful seizure and conversion of private trust property; denial of due process; color of law violations.

VIII. REQUESTED IN COMPLAINT:

☒ CHECK YES ONLY IF DEMANDED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No

IX. RELATED CASE(S) IF ANY: (if applicable)

Judge: _____ Docket Number: _____

X. SIGNATURE OF PARTY OR REPRESENTATIVE:

Calloway Iv, Jesse — Attorney-in-Fact, Administrator of the Calloway Estate Trust

DATE:

10th day of July 2025

Calloway Iv, Jesse Attorney in Fact, Administrator

